

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:24-cv-06795

MDL No. 3121

Hon. Matthew F. Kennelly

Class Plaintiffs' [Proposed] Scheduling Order

<u>EVENT</u>	<u>DEADLINE</u>
First day on which third set of RFPs and other written discovery requests may be served.	June 24, 2025
Production of structured data samples (at least 50 lines)	July 24, 2025
Answers and Counterclaims Under FRCP 12 to Consolidated Class Action Complaint and Amended Consolidated Master Direct Action Plaintiff Complaint	August 12, 2025
<p>Deadline for producing party's disclosure of initial list of its own proposed document custodians and custodial sources as to requests for which it agrees to produce documents [ESI Protocol V.A]</p> <p>Deadline to meet and confer regarding non-custodian document sources that the producing Party believes, based on its investigation to date, may reasonably be likely to contain unique information responsive to requests for which it agrees to produce documents [ESI Protocol V.B]</p> <p>Deadline to meet and confer regarding (i) potential use and identification of search terms, tools, or techniques, (ii) use of technology assisted review or artificial intelligence ("TAR/AI") in whole or part to cull any corpus of materials, and (iii) all parameters for scoping the review and production efforts (e.g., application of date ranges, custodians, non-custodial sources, etc.) for requests for which the producing party agrees to produce documents. [ESI Protocol V.E.1.a]</p>	August 25, 2025

<u>EVENT</u>	<u>DEADLINE</u>
By no later than 45 days after service of responses and objections to the third sets of requests for production, the Parties will: (a) submit a TAR/AI Protocol to the Court or (b) submit letter briefs of no more than 5 pages total for Plaintiffs and one letter brief of no more than 5 pages total for Defendants concerning any disputes as to the TAR/AI Protocol. [from ESI Protocol Section E.2.a.]	September 8, 2025
Deadline to submit agreed deposition protocol and agreement on number of fact depositions, or joint motion setting forth areas of dispute	September 8, 2025
Joint status report and a proposed order concerning agreements on the scope and format of production of structured data or, if disagreement on the proposed order, Plaintiffs collectively may file a letter brief of up to 10 pages and Defendants collectively may file a letter brief of up to 10 pages.	August 18, 2025
Deadline to complete search methodology negotiations and submit any remaining search term disputes relating to 3rd RFPs. ESI Protocol Section V.E.3.e-f (page 27-28).	September 12, 2025
Deadline to complete production of structured data requested in Plaintiffs' and Defendants' Third Set of RFPs	October 16, 2025
Deadline for completion of document productions in response to third set of RFPs	December 12, 2025
Deadline for any motions to amend the pleadings	January 21, 2026
Last day on which parties may serve requests for production, with the exception of witness-specific requests for production directly related to scheduled depositions	June 3, 2026
Last day on which parties may serve interrogatories	July 3, 2026
Close of Fact Discovery	August 17, 2026
Class and DAP Plaintiffs' Opening Merits and Class Certification Expert Reports	October 1, 2026
Defendants' Merits and Class Certification Opposition Expert Reports	November 16, 2026
Class and DAP Plaintiffs' Rebuttal Expert Reports	January 12, 2027

<u>EVENT</u>	<u>DEADLINE</u>
Close of Expert Discovery	February 26, 2027
Class Certification & <i>Daubert</i> Motions (Class and Merits)	April 12, 2027
Class Certification & <i>Daubert</i> Opposition Briefs	May 27, 2027
<i>Daubert</i> Reply Briefs	July 12, 2027
Class Certification Reply Brief	July 26, 2027
Class Certification and <i>Daubert</i> Hearing	Court's discretion
Summary Judgment Motions	August 25, 2027
Summary Judgment Oppositions	September 24, 2027
Summary Judgment Replies	October 25, 2027
Summary Judgment Hearing	Court's discretion
Pre-Trial Conference	Court's discretion
Trial	Late 2027 or Court's discretion

SO ORDERED this ____ day of _____, 2025.

Honorable Matthew F. Kennelly
United States District Judge